

## REMARKS

Reconsideration of this application is respectfully requested.

## I. Status of the Claims

Claims 2 - 8 and 10 - 30 are currently pending. With this Response, claim 30 is canceled without prejudice or disclaimer, claims 3, 12, 17, 18, 21 - 27, and 29 are amended, and new claims 31 and 32 are added. No new matter is introduced. Support for the amendments may be found, for example, at page 12, line 20 through page 13, line 17 and page 14, line 15 through page 16, line 23 of Applicants' specification.

## II. Acknowledgment of Allowable Subject Matter

Applicants thank the Examiner indicating that claims 3, 10, 12-16, 18-22, 24, 27, 28 and 30 are objected to as each being dependent on a rejected base claim, and that each would be allowable if rewritten in independent form including all limitations of its base claim and any intervening claims.

As noted below, Applicants cancel claim 30 without prejudice or disclaimer, amend independent claims 17, 23 and 29 to essentially include the elements of allowable claim 30, and respectfully submit that each of amended independent claims 17, 23 and 29 are allowable. As claims 3, 10, 12-16, 18-22, 24, 27, and 28 each depend from one of allowable independent claims 17, 23 and 29, Applicants respectfully submit that claims 3, 10, 12-16, 18-22, 24, 27, and 28 are allowable and request that the objection to the claims be withdrawn.

### **III. Rejections under 35 U.S.C. § 102**

Claims 2, 8, 11, 17, 23, and 29 are rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 4,036,365 to Rosenfeld. Applicants respectfully traverse this rejection.

In the interests of prosecution efficiency, Applicants cancel claim 30 without prejudice or disclaimer, and amend independent claims 17, 23 and 29 to essentially include the elements of allowable claim 30. As noted above, claim 30 was identified by the Examiner as containing allowable subject matter.

For example, amended independent claim 17 claims:

**17. A device for sorting of laundry pieces comprising:**

a feed device that receives the laundry pieces and dispenses them;

a transport device for transporting different types of laundry pieces dispensed from the feed device at a predetermined interval, wherein the interval is one of a predetermined distance between the laundry pieces on the transport device and a predetermined period of time between the dispensing of the laundry pieces, so that individual laundry pieces are separated from each other, and wherein the transport device comprises a conveyor belt that transports the individual, separated laundry pieces in a transport direction;

a first collection device for receiving a first type of laundry piece, the first collection device being disposed in a receiving relationship to the transport device;

a second collection device for receiving a second type of laundry piece, the second collection device being disposed in a receiving relationship to the transport device;

a recognition device disposed near the transport device for determining different types of laundry pieces dispensed on the transport device, and for generating a data signal related thereto, the transport device transferring a laundry piece according to the data signal, the transport device transferring the laundry piece to a region near the first collection device if the data signal indicates that laundry piece is of a first laundry type, and transferring the laundry piece to a region near the second collection device if the data signal indicates that the laundry piece is of a second type;

a registering device located with respect to the first collection device and to the second collection device for registering the transferred laundry piece and generating a corresponding register signal;

a data processor connected to the recognition device and to the registering device for receiving and processing the data signal received from the recognition device, and for receiving and processing the register signal received from the registering device, and generating a control signal in response thereto; and

a controller connected to the data processor for receiving the control signal, the controller selecting one of the first collection device and the second collection device based on the control signal and operating the selected collection device to receive the transferred laundry piece.

(Emphasis added).

Rosenfeld discloses linen sorter having individual pickers 50 that grasp laundry pieces from a hopper 20 (see, e.g., FIG. 1 of Rosenfeld). Each picker 50 passes with one or more laundry pieces 72 through a recognition device 32, 34, and then moves on to a location over a selected one of collection containers 60 - 70. The pickers 50 are directed by control signals produced by the recognition device 32, 34.

In amended independent claim 17, Applicants claim a device for sorting laundry pieces that comprises a feed device, a transport device, first and second collection devices, a recognition device, a data processor and a controller. In sharp contrast to the linen sorter of Rosenfeld, claim 17 specifies that the transport device comprises a conveyor belt that transports individual, separated laundry pieces in a transport direction. Applicants' claimed transport device, in particular in combination with the claimed feed device, eliminates the pickers used by Rosenfeld in favor of a conveyor belt for sequentially transporting individual laundry pieces on the conveyor belt surface. By eliminating the picking operation used in Rosenfeld's device, Applicants provide a simpler and

gentler mechanism for transporting individual laundry pieces to the collection devices in a sequential fashion.

Accordingly, as Rosenfeld fails to teach each and every element of Applicant's device as claimed, amended independent claim 17, is not anticipated by Rosenfeld. In addition, as the pickers 50 of Rosenfeld's device are necessary to select and transport laundry pieces 72 from the hopper 20, Rosenfeld's device cannot be operationally modified to directly replace pickers 50 with Applicants' claimed conveyor belt. As a result, Rosenfeld cannot be combined with another reference directed to conveyor belts in order to make obvious Applicants' claimed device.

As a result, Applicants respectfully submit that amended independent claim 17 is neither anticipated nor made obvious by Rosenfeld or any other cited reference, and is therefore in condition for allowance. As amended independent claim 29 also claims a device for sorting laundry pieces that comprises a conveyor belt for transporting individual, separated laundry pieces in a transport direction, Applicants respectfully submit that amended independent claim 29 is also allowable for the above-argued reasons.

Amended independent claim 23 is directed to a method of sorting laundry pieces, including the step of

operating the conveyor belt to receive the laundry pieces dispensed from the feed device to the transport device and to transport the individual, separated laundry pieces to positions on and along the conveyor belt that are within reach of a recognition device and in a delivery relationship to a plurality of collection devices.

(Emphasis added).

As Rosenfeld neither discloses nor suggests a linen sorter having a conveyor belt that can be operated to transport individual laundry pieces sequentially, Applicants also submit that amended

independent claim 23 is neither anticipated nor made obvious by Rosenfeld, and stands in condition for allowance. In addition, as each of claims 2, 8, and 11 depend from allowable independent claim 29, Applicants submit that dependent claims 2, 8, and 11 are also allowable for at least this reason. Accordingly, Applicants respectfully request that the rejection under 35 U.S.C. § 102(b) be withdrawn.

**IV. Rejections under 35 U.S.C. § 103**

Claims 4-7 and 25-26 are rejected under 35 U.S.C. § 103(a) as obvious over Rosenfeld in view of U.S. Patent No. 4,239,435 to Weiss et al. ("Weiss"). Applicants respectfully traverse this rejection.

As each of claims 4-7 and 25-26 depends from one of allowable independent claims 17, 23, and 29, Applicants submit that dependent claims 4-7 and 25-26 are allowable for at least this reason and Applicants respectfully request that the rejection under 35 U.S.C. § 103(a) therefore be withdrawn.

**V. New Claims**

Applicants add new claims 31 and 32, which each depend from allowable claim 29, and submit that new claims 31 and 32 are allowable for at least this reason.

**CONCLUSION**

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

The Examiner is respectfully requested to contact the undersigned at the telephone number indicated below once he has reviewed the proposed amendment if the Examiner believes any issue can be resolved through either a Supplemental Response or an Examiner's Amendment.

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Respectfully submitted

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